



# Illinois Department of Natural Resources

One Natural Resources Way Springfield, Illinois 62702-1271  
<http://dnr.state.il.us>

Pat Quinn, Governor

Marc Miller, Director

August 11, 2011

Mr. Dennis Sandquist  
Director  
McHenry County Dept of Planning and Development  
McHenry County Government Center  
2200 N. Seminary Avenue  
Woodstock, IL 60098

**Re: ComEd Utility Pole Reconductoring SR23-Pleasant Valley**  
**Project Number(s): 1200659**  
**County: McHenry**

Dear Mr. Sandquist:

The Department received a submission from Chris Burke Engineering, Ltd, via the Department's Ecological Compliance Assessment Tool (EcoCAT) website, on behalf of McHenry County, regarding this project in Sections 19 and 20, Township 44 North, Ranges 6 and 7 East for consultation in accordance with the *Illinois Endangered Species Protection Act* [520 ILCS 10/11], the *Illinois Natural Areas Preservation Act* [525 ILCS 30/17], and Title 17 *Illinois Administrative Code* Part 1075.

The project involves ComEd reconductoring an existing overhead electric line and installation of six new utility poles. The entire project length is 10.8 miles and covers approximately 131 acres, of which approximately 23 acres consist of wetland area. The remainder of the right-of-way consists of active agricultural land, residential areas and some wooded areas maintained already for utility line clearance. A portion of the work zone will extend through wetland contiguous with the Kishwaukee River. ComEd will use a helicopter or walk in to complete maintenance within the large wetland areas and will be using state of the art wetland matting around pole locations.

The project is located north of several records of the State-listed endangered **Blanding's Turtle**, *Emydoidea blandingii*, and in the vicinity of the Kishwaukee River **Illinois Natural Area Inventory Site (INAI)**.

The Department has completed its review of the project and determined that the action may have an adverse impact on Blanding's Turtles and the INAI site. To minimize potential impacts, the Department recommends the following measures be implemented by ComEd and incorporated into the County's project authorization.

## **Blanding's Turtles**

Pleasant Valley INAI, which is south/southeast of this project, provides habitat for one of the largest populations of Blanding's Turtles in McHenry County. Since this species inhabits a variety of wetland and upland habitats, these turtles will attempt to travel north in search of upland nesting sites.

1. The Department recommends that construction crews, and all on-site personnel, be educated and informed about Blanding's Turtles before work begins. Photos of both adult and juvenile Blanding's turtles should be

distributed and the site management plan for responding to potential encounters should be discussed in a training session and at a preconstruction site meeting. ComEd maintenance crews should also be educated about this species in the event any are encountered during routine maintenance schedules.

Mowing regimes for ComEd sites such as this present an added risk of injury or death to turtles as they travel to and from wetlands during spring, summer, and fall. Anyone that will be mowing should also be educated about the species, be aware that they may be present between March – October, and be instructed on what to do if any Blanding's Turtles are encountered.

2. If a turtle is encountered on site, personnel should be instructed to immediately stop construction in the surrounding area and contact the McHenry County Conservation District (815/678-4532) and the Department's Heritage Biologist (Brad Semel, 815/675-2386 x 317) keeping in mind it is a criminal act to handle a listed species. Personnel on site should watch the turtle until the proper authority arrives to alleviate the situation, keeping at a respectable distance. If the turtle moves, crews should mark the spot they first saw the turtle and the last spot it was seen.

If a Blanding's Turtle is encountered, Incidental Take Authorization from the Department's Office of Resource Conservation will most likely be recommended, which would result in a Conservation Management Plan for the species for this project.

3. The extensive project area may contain an unknown nesting site or the route to a nesting site. Therefore, potential harm to transiting turtles is a concern. The Department recommends limiting maintenance activities to between October 31 and mid March, when this species is hibernating, to prevent vehicles or equipment from crushing or injuring juvenile or adult turtles.

4. If maintenance or construction cannot be limited to the recommended time frame, exclusionary fencing should be installed and in place, from the beginning of March and remain until the end of October, to prevent turtles from entering these areas. Daily inspections of both sides of the fence should occur for the first two weeks and then be maintained weekly throughout the construction period to ensure the exclusionary fencing has been properly installed (dug into the ground) and to check if any turtles are present on either side of the fence.

5. The Department recommends that any trenches or excavations dug as a result of this project be covered at the end of each work day. Before starting each work day, trenches and excavations should be routinely inspected to ensure no turtles (or other animals) have become trapped within them.

### **Kishwaukee River INAI**

All erosion and sedimentation control measures being implemented for this project should be monitored and inspected on a daily basis, by ComEd and CBBEL staff, for portions of the work zone within or near the INAI site and its associated wetlands. Daily reports should then be provided to the County.

Consultation on the part of the Department is completed. In accordance with 17 Ill. Adm. Code 1075.40(h), the County must notify the Department of its decision regarding these recommendations, whether they will:

- Allow the action to proceed as originally planned;
- Require the action to be modified per Department recommendations (please specify which measures if not all will be required); or
- Forgo the action.


This consultation is valid for two years unless new information becomes available that was not previously

considered; the proposed action is modified; or additional species, essential habitat, or Natural Areas are identified in the vicinity. If the project has not been implemented within two years of the date of this letter, or any of the above listed conditions develop, a new consultation is necessary.

The natural resources review reflects the information existing in the Illinois Natural Heritage Database at the time of the project submittal, and should not be regarded as a final statement on the site being considered, nor should it be a substitute for detailed site surveys or field surveys required for environmental assessments. If additional protected species are encountered during the project's implementation, you must comply with the applicable statutes and regulations. Also, note that termination does not imply IDNR's authorization or endorsement of the proposed action.

Please contact me if you have questions regarding this consultation review.

With Warm Regards,

A handwritten signature in cursive script that reads "Kathi Davis".

Kathi Davis  
Division of Ecosystems and Environment  
217-785-5500

Cc: Brad Semel, IDNR/Region II/ Natural Heritage  
Ray Eisbrener, IDNR/Region II/Wildlife  
Cory Horton, McHenry County Dept of Planning & Development  
Darrell Moore, McHenry County Dept of Planning & Development  
Elizabeth Kessler, McHenry County Conservation District  
Cindy Skrukrud, McHenry County Defenders/1075.70  
Lisa Haderlein, The Land Conservancy of McHenry County/1075.70